

**From:** [Ruhl, Christopher](#)  
**To:** [Ruhl, Christopher](#); [Eoc, Epahq](#)  
**Cc:** [Coleman, Sam](#); [McQuiddy, David](#); [Smith, Monica](#); [Petersen, Chris](#); [Broyles, Ragan](#); [Webster, Susan](#); [Edlund, Carl](#); [Phillips, Pam](#)  
**Subject:** RE: Response to Stanton  
**Date:** Thursday, April 18, 2013 2:08:07 PM

---

Sorry I sent the earlier email by mistake. The email below should answer all but two of Larry's questions. The following two were not answered. Also, please note that these comments are currently being reviewed within the Region and have not been released.

LS - Bottom line – did we have any issues with their WCS?

Facility used an acceptable model to calculate WCS. The inspection did note that they used an outdated CENSUS survey.

LS - Did we review their 2011 submission yet? If so, what was/is our opinion of it?

Prior today, the Region had not reviewed the updated RMP.

Chris Ruhl  
USEPA Region 6  
Oil Team Leader  
Federal On-Scene Coordinator  
(214) 665-7356 office

-----Original Message-----

From: Ruhl, Christopher  
Sent: Thursday, April 18, 2013 1:57 PM  
To: Eoc, Epahq  
Cc: Coleman, Sam; McQuiddy, David; Monica Smith; Petersen, Chris; Ragan Broyles; Susan Webster  
Subject: Response to Stanton

Chris Ruhl  
USEPA Region 6  
Oil Team Leader  
Federal On-Scene Coordinator  
(214) 665-7356 office

-----Original Message-----

From: Coleman, Sam  
Sent: Thursday, April 18, 2013 1:44 PM  
To: Ruhl, Christopher  
Subject: Fw: West Fertilizer : Q/As w/ 3 ESA .pdf's

Samuel Coleman, P.E.  
Deputy Regional Administrator, Region 6  
214.665.3110 Direct  
214.789.2016 Cell

---

From: Coleman, Sam  
Sent: Thursday, April 18, 2013 1:35:44 PM  
To: Gray, David  
Subject: Fw: West Fertilizer : Q/As w/ 3 ESA .pdf's

Use this.

Samuel Coleman, P.E.  
Deputy Regional Administrator, Region 6  
214.665.3110 Direct  
214.789.2016 Cell

---

From: McQuiddy, David  
Sent: Thursday, April 18, 2013 1:35:05 PM  
To: Coleman, Sam  
Subject: FW: West Fertilizer : Q/As w/ 3 ESA .pdf's

Wes McQuiddy  
Chief, Emergency Readiness Section  
U.S. EPA Region 6 (6SF-PE)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733  
214-665-6722

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

-----Original Message-----

From: McQuiddy, David  
Sent: Thursday, April 18, 2013 1:28 PM  
To: Coleman, Sam  
Subject: FW: West Fertilizer : Q/As w/ 3 ESA .pdf's

1. Does EPA regulate fertilizer; if not, is it a state responsibility?

EPA regulates anhydrous ammonia, a type of fertilizer, under the Chemical Accident Prevention Provisions at 40 CFR Part 68. States may also have their own requirements.

2. What enforcement actions has EPA taken against this plant; how do we get a copy?

The facility is subject to the Chemical Accident Prevention provisions at 40 CFR Part 68 because the quantity of anhydrous ammonia on-site exceeds 10,000 lbs. The facility has not reported a major accident in the last five-years.

EPA conducted an inspection of the facilities Risk Management Program at West Fertilizer on March 16, 2006. At that time, inspectors identified deficiencies including:

- Failure to update its RMP in a timely manner. The update was due in 2004, but wasn't updated until 2006.
- Failure to document that hazards identified in the hazard review had been addressed.
- Operating procedures failed to address consequences of deviation.
- Poor employee training records.
- The company had not developed a formal written maintenance program.
- The facility was fined \$2,300.00 on August 14, 2006 and the company certified they corrected the deficiencies at that time.

The facility submitted last submitted an updated plan in 2011.

3. What is EPA doing on the scene for emergency response?

EPA has deployed 4 OSCs, 8 contractors and the mobile command post to the site. Additional staff are on standby. Air monitoring is being done by the State at this time. EPA will coordinate with TCEQ and multiple state and local partners to meet the ongoing needs of the response.

4. What might the explosion mean in terms of air quality?

We are continuing to monitor air quality data and will be providing information / advice to the lead agency.

5. Is there a risk management plan for the facility? How do we see it? –

Yes, West Fertilizer has submitted a Risk Management Plan dated 2011, a summary of which is attached. To view the entire plan, contact EPA in Dallas to schedule an appointment.

6. In a sentence, what is the purpose of risk management plans?

Risk management plans are facility generated plans that describe their efforts to safely manage hazardous materials or chemicals to avoid impacts to the public.

The Risk Management Program is about reducing chemical risk at the local level. This information helps local fire, police, and emergency response personnel (who must prepare for and respond to chemical accidents), and is useful to citizens in understanding the chemical hazards in communities. EPA anticipates that making the RMPs available to the public stimulates communication between industry and the public to improve accident prevention and emergency response practices at the local level.

7. What are the potential health threats from the explosion?

We are currently working with local authorities to determine what impacts may have occurred. Efforts are focused on protecting responders and the public, and keeping everyone informed.

8. How do we see a copy of the complaint or enforcement action? Copy attached as a .pdf.

Attachment

West Fertilizer

6SF conducted an inspection of the RMP at West Chemical and Fertilizer on March 16, 2006.

Deficiencies identified included:

Failure to update its RMP in a timely manner. Due in 2004, didn't update until 2006.

Failure to document that hazards identified in the hazard review had been addressed.

Operating procedures failed to address consequences of deviation.

Poor employee training records.

Had not developed a formal written maintenance program.

The facility was fined \$2,300.00 on August 14, 2006. The facility self-certified that they had corrected issues.

Offsite Consequence Analysis

Worst case release – 54,000 lbs anhydrous ammonia released as a gas over 10 minutes with a distance to toxic endpoint of 1.5 miles. Population within a 1.5 mile circle – 2,500.

Alternative Release Scenario – Loss of 11,908 lbs of anhydrous ammonia from a transfer hose failure over 2 minutes with a distance to endpoint of 0.83 miles. Population within a 0.83 mile circle -1,200.

The facility also reported the presence of 54,000lbs of anhydrous ammonia on site within their Tier II report to the State of Texas.